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11 *Taylor Thomson*

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 Taylor Thomson,

15 Plaintiff,

16 v.

17 Persistence Technologies BVI Pte Ltd.,  
18 Tushar Aggarwal, Ashley Richardson,

19 Defendants.

Case No. 2:23-cv-04669-MEMF-MAR

**PLAINTIFF TAYLOR THOMSON'S  
STATEMENT CONCERNING  
COURT'S FEBRUARY 26 ORDER**

The Honorable Maame Ewusi-Mensah  
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28 **PLAINTIFFS' STATEMENT  
CONCERNING COURT'S  
FEBRUARY 26 ORDER**

1 On February 26, 2025, the Court ordered the Parties to submit a new Schedule  
2 of Pretrial and Trial Dates Worksheet by March 12, 2025. (Dkt. 88.) On March 12,  
3 2025, the Parties submitted the Worksheet, with Plaintiff Taylor Thomson proposing  
4 dates based on an April 20, 2026 trial date while Defendant Ashley Richardson  
5 proposed dates based on a November 11, 2025 trial date.

6 Plaintiff's newly proposed dates are based on the fact that no discovery has yet  
7 occurred in this matter. Though Plaintiff served Defendant with initial requests for  
8 production of documents and interrogatories in September 2024, no responses have  
9 been provided to date. Plaintiff's proposed fact and expert discovery cut-off dates of  
10 October 17, 2025, and November 21, 2025, respectively, account for the time needed  
11 to complete document discovery. Further, because Defendant Richardson is  
12 proceeding *pro se*, additional time is needed to accommodate any additional issues  
13 that may arise.

14  
15 Dated: March 12, 2025

**MCDERMOTT WILL & EMERY LLP**

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17 By: /s/ Julian L. André

18 Julian L. André  
19 Joseph B. Evans  
20 Todd Harrison

21 *Attorneys for Plaintiff Taylor Thomson*  
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**PROOF OF SERVICE**

I, Lidia Aragon, declare:

I am employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 2049 Century Park East, Suite 3200, Los Angeles, CA 90067-3206. On March 12, 2025, I caused to be served a copy of the within document(s):

**PLAINTIFF TAYLOR THOMSON'S STATEMENT CONCERNING  
COURT'S FEBRUARY 26 ORDER**

- ☒ By overnight mail service: by placing the document(s) listed above in a sealed Federal Express envelope and affixed a pre-paid air bill, and caused the envelope to be delivered to a Federal Express agent for delivery.
- ☒ By email via pdf file, by transmitting on this date via email, a true and correct copy scanned into an electronic file in Adobe "pdf" format. The transmission was reported as complete and without error.

**SEE ATTACHED SERVICE LIST**

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 12, 2025 at Los Angeles, California.

By: \_\_\_\_\_

LIDIA ARAGON

**SERVICE LIST**

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